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ENTACT

environmental tactics for toxic materials control

via facsimile and US Mail

July 9, 1998

Mr. Brad Bradley, RPM
U.S.EPA, Region 5 (SR-6J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3507

RE: NL/Taracorp NPL Site

Dear Brad:

Based on discussions with the United States Environmental Protection Agency (U.S. EPA) and issues related to implementation of the required remedial activities for the Granite City Site, residential and remote fill removal activities, ENTACT is requesting modifications of the workplan entitled "Draft Remedial Activities Workplan, NL Industries/Taracorp Superfund Site, Residential Areas and Remote fill Locations, Granite City, Illinois" (the Workplan) dated May 29, 1998. Specifically, ENTACT is requesting two modifications: 1) The establishment of a staging area for the excavated residential soils on a portion of the "asphalt treatment pad" located at the industrial portion of the site, and 2) the establishment of a staging area for clean backfill to be used to backfill the excavated residential and remote areas at a location acceptable to U.S. EPA.

Briefly, with respect to the staging area for excavated soils, ENTACT proposes to transport the excavated material by truck to the industrial site from the residential and remote areas and stage the material on the asphalt pad for subsequent transport to the disposal facility. On a periodic basis, e.g., every 45 days, the stock piled material will be loaded in trucks for off-site disposal. Presently, the U.S. EPA has approved the staging of the excavated material in residential yards before transportation to the approved off-site disposal facility.

The proposed staging area is located at the State Street Warehouse off State Street in Granite City. The exact location is the asphalt covered pad that OHM constructed when they performed soil stabilization activities. The pad integrity is good and with an asphalt curb to control run-off. The State Street Warehouse proprietors have given us permission to stage the material at this location. The following additional protective measures will be developed to minimize releases from the pile: a) a dry decontamination station will be installed to ensure that visible soils on truck tires is removed before trucks are driven off-site; b) storm-water control measures will be implemented to minimize run-off in the staging area; and c) dust suppression measures will be taken, as needed, to reduce visible particulate dust in the vicinity of the staging area. ENTACT will designate "load-out" days from the stockpile where we can manifest each load for disposal to the landfill.

Briefly, with respect to the staging area for clean backfill, ENTACT proposes to transport the clean backfill to an U.S. EPA approved location for staging purposes. The following additional protective measures and/or plans will be developed to minimize releases from the pile: a) storm-water control measures will be implemented to minimize run-off in the staging area, and b) dust suppression measures

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will be taken, as needed, to reduce visible particulate dust in the vicinity of the staging area. The U.S. EPA has informally approved this modification verbally with ENTACT personnel.

ENTACT feels that these modifications to the Workplan will facilitate a more efficient removal and backfilling process in the areas to be excavated and backfilled, thus reducing the amount of "property downtime" at each address. In addition, these modifications will reduce the number of trucks on the road due to the increased capacity of semi-tractor trailer loads transporting soil vs. tandem axle trucks.

At your convenience, we would like to discuss the modifications detailed in this letter sometime on Friday July 10, 1998. Based on a conversation I had with Ms. Sheri Bianchin today, a time of 10:30 am was suggested. If this time is not convenient please contact me at 972.580.1323. We thank you for your prompt attention in this matter.

Respectively,

Thad Slaughter
ENTACT, Inc.